

Western Resource Adequacy Program

# Committee of State Representatives

Thursday, June 26, 2025

# Agenda

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1. Welcome and Roll Call
2. WRAP Data Request Template Review and Discussion
3. Capability Testing Presentation
4. Upcoming Meetings
5. Adjourn

# WRAP Data Request Template

# PARTICIPATION DATA

- » Forward Showing *(Starting with Winter 2024-2025 data)*
  - Number of Participants submitting a FS Submittal at the FS Deadline
  - Number of Participants needing to cure something
  - Number of Participants submitting a cured FS Submittal by the cure deadline
- » Operations Program *(Starting with Summer 2024 data)*
  - Number of Participants submitting at least 1 file
  - Number of Participants submitting all files

# FORWARD SHOWING SUBMITTAL

## *STARTING WITH WINTER 2024-2025 DATA*

- » Number of Participants passing (passing = all months of the season) and participants failing (any month, for any reason)
- » Total aggregate number of uncured deficiencies
  - Breakdown of sources of deficiencies (lack of JCAFs, capability testing documentation, operational testing documentation, P50 load validation, attestations, not meeting FS Capacity or Tx Requirement, etc.)
  - *Note that WPP plans to provide context to COSR regarding how BPM completion (some endorsed as recently as Sept 2024, after the Winter 24/25 showing and cure) and non-binding status influenced completion of all required documentation to cure deficiencies*
- » Total FS capacity requirement (MW) for each month, by Subregion

# FORWARD SHOWING SUBMITTAL

*STARTING WITH WINTER 2024-2025 DATA*

- » Sum of all QCC claimed by Participants and *FULLY validated*, capped by each participants' Monthly FS Capacity Requirement
  - i.e., for Participants that *failed* X month, the total validated capacity they provided in X month will be added to the sum; for Participants that *passed* X month, their Monthly FS Capacity Requirement will be added
  - This ensures we are not including surplus from passing participants
- » Sum of all QCC claimed by participants but NOT fully validated, capped by each participant's Monthly FS Capacity Requirement

# WRAP Data Request

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- Based on discussions with WPP and COSR members, staff has created a data request template for individual COSR members to use with their State-Regulated WRAP Participants (SRWPs)
  - Effort to protect confidential and/or commercially-sensitive data
  - Individual commissions can customize based on what information they want to see
- Includes the following requests:

# WRAP Data Request

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- Re: Data submitted for Summer 2025 and Winter 2026/27 Forward Showing
  - Please provide the complete workbook and relevant files submitted to the Western Power Pool as part of the Summer 2025 and Winter 2026/27 Forward Showing (FS) submittal processes as described in Business Practice Manual 108.
- Re: Resources and attributes not submitted for Summer 2025 and Winter 2026/27 FS
  - Please identify any resources or attributes otherwise subject to the FS requirements *not* submitted and the rationale behind the non-submittal.

# WRAP Data Request

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- Re: Status of current participation in WRAP
  - Please describe the Company's current status in the FS program, and, if applicable, any correspondence with the Program Administrator or Program Operator regarding participation, non-compliance notices, or exemptions.
  - If the Company is exploring participation in the first binding season, please describe any steps the Company is taking or plans to take to ensure full compliance with WRAP and complete data submission going forward toward the first binding season.
- Re: Limitations to data submissions or WRAP participation
  - Please describe and explain any internal Company policies, technical limitations, or regulatory constraints (e.g. Senior Official Attestation for FS Demonstration, Joint Contract Accreditation Forms, etc.) that have affected your data submissions or program participation, especially as it relates to the binding program transition.

# Capability Testing



# **WESTERN RESOURCE ADEQUACY PROGRAM**

June 26<sup>th</sup>, 2025

**COSR**

**Resource Testing**

# RESOURCE TESTING IN THE WRAP TARIFF

## QCC - 16.2.5

- » “For resources that use conventional thermal fuels, including but not limited to, coal, natural gas, nuclear, and biofuel, WPP will determine QCC based on an Unforced Capacity methodology that employs resource-specific **capability testing** and **capability requirements** to determine an Installed Capacity value, and a forced outage calculation methodology based on historical performance during Capacity Critical Hours over a specified multi-year period (excluding outages properly reported as “outside management control”), or based on class-average forced outage data, as specified in the Business Practice Manuals, if there is insufficient data on historical performance.”
- » A Participant’s Demand Response used as a Demand Response Capacity Resource must be controllable and dispatchable by the Participant or by the host utility, and must have met certain **testing requirements** consistent with Business Practice Manuals. WPP will determine Demand Response Load Modifier QCC by multiplying the load reduction in MWs by the number of hours the resource can demonstrate load reduction capability (for a period of up to five continuous hours) divided by five. The effects of Demand Response used as a Demand Response Capacity Resource must not be included in load provided for a Participant’s Advance Assessment.

# TESTING IN THE BPMs

## *BPM 105 QUALIFYING RESOURCES*- §3.4.2 CAPABILITY TESTING

### » BPM Definitions

- **Capability Test:** The demonstration of capability of certain Qualifying Resources by generating at their rated capability under specified test conditions and test duration
- **Net Generating Capability:** The gross maximum output of a Qualifying Resource reduced by any power used for auxiliary power requirements demonstrated through a Capability Test. May be used interchangeably with Installed Capacity when referencing Thermal Resources

» Capability Tests are required for Thermal Resources, Long Duration Storage, and Demand Response Capacity Resources at least every five years

» All resources must also perform annual Operational Testing (for other resources these tests will counts as Capability Tests) – see next slide

### » Thermal Resources

- Capability Tests used as base value to which a forced outage factor (during Capacity Critical Hours) is applied to determine QCC
- Summer Testing should be conducted at a temperature no more that 10° F below the resource location’s ambient temperature for a minimum of one hour

### » Long Duration Storage

- No temperature or additional timing requirements

### » Demand Response Capacity Resources

- Show a sustained reduction in load attributable to the controllable and dispatchable program for up to five hours



# TESTING IN THE BPMS

## *BPM 105 QUALIFYING RESOURCES* - §3.4.3 OPERATIONAL TESTING

- » **Operational Test:** The annual demonstration of the functional ability of a Qualifying Resource
- » **Thermal Resources and Long Duration Storage** - Annual demonstration of ability to generate at a minimum 90% of Net Generating Capability (as determined by Capability Test), for one hour, no temperature requirements. Failure to generate at 90% Net Generating Capability will lead to QCC being calculated based on actual Operational Test results
- » **Storage Hydro Resources** - Operational Test must achieve a minimum of 90% of the plant's highest monthly QCC value, for one hour, no temperature requirements
- » **Demand Response Capacity Resources** - Show a sustained reduction in load attributable to the controllable and dispatchable program at a minimum of 50% of claimed reduction (to minimize disruption) for a minimum of one hour
- » **Run of River** - Operational Tests shall be conducted at a minimum of 90% of the QCC for either Binding Season
- » **Energy Storage Resources** - Operational Test must be conducted for at least claimed duration of device (two-hour, four-hour, etc). Must be able to achieve full QCC
- » **Wind and Solar** - Operational Tests conducted at minimum of 100% of the seasonal QCC for either Binding Season

# TESTING IN THE BPMS

## *BPM 105 QUALIFYING RESOURCES* - §4 QCC OF RESOURCES

- » **Thermal or Long Duration Storage:** calculate forced outage factor (based on performance during CCHs) and apply to Net Generating Capability as determined by Capability Test; QCC limited by Operational Test
- » **Variable Energy Resources:** ELCC analysis by VER Zones for resource type, limited by Operational Test
- » **Energy Storage:** ELCC based on at least four continuous hours of operation, limited by Operational Test
- » **Hybrid Facilities:** Use method for each resource component and cap at interconnection limit
- » **Demand Response:** Based on max load reduction capable of sustaining for up to five hours, limited by results of Capability Test
- » **Storage Hydro:** QCCs calculated by Participant owners based on performance during CCHs, limited to Operational Test result if fails to meet 90% of highest previous QCC
- » **Run of River:** Based on historical performance during CCHs over the last ten years, limited to Operational Test result if fails to meet 90% of previously claimed QCC



# QUESTIONS?

*[WRAP@WesternPowerPool.org](mailto:WRAP@WesternPowerPool.org)*

# Upcoming Meetings

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- June 26 – RAPC Meeting
- July 10 – RAPC Meeting
- July 16 – PRC Meeting
- July 24 – COSR Meeting
- July 24 – RAPC Meeting

Adjourn